P7
205.250

(2) Aquaculture facilities shall be designed & operated to minimize the release of nutrients & wastes to the environment.
Quite an ambiguous statement in that facility design is maybe a reference to geographical position of the site & minimising impact this way. Site equipment itself may not be what is meant here.
The release of nutrients & wastes are more directly apportioned to inputs into the fish than site selection.
Would siting a feed barge be classified as minimising nutrient load, as it will control feed input?

(4) Metabolic products
JSF work with seaweeds on sites will assist us in meeting this criteria

P8.
205.251

Exogenous feeding
This term refers to the stage where cod hatch & complete eating their yoke sack, just before they begin on live prey.

(a)
Organic management must begin within 2 days of exogenous feeding which is quite early & we would need to look at the sources of our rotifers & artemia in order to satisfy this.
The 5% of market weight option quoted in this paragraph would help JSF. Although the market weight set for cod in this standard is 2000g, our organic management starts before the fish reach 5% of this. ie 100g.
Nonetheless it would be worth changing the market weight of organic cod to 4Kg.

P10
205.252

OPTION A
(a) Providing minimum feed requirement for an aquatic animal does not directly relate to minimising environmental impact of released nutrients.
Perhaps these points should be separated.

(e) Wild fish can never be certified as organic. Therefore, we cannot source fish meal or oil from a wild fish certified as organic. Even MSC certified sustainable fisheries may not necessarily provide the right species for fish meal or oil for an organic feed.

(g)
1. Pound for pound (feed sourcing vs fish growth) is only theoretical as there will always be an element of wastage due to wet weight vs dry weight.
2. Needs further clarification

P.11
(l) We would need to see the list of which pigmenting compounds which are allowed under US Food & Drug Administration

OPTION B
(b) Difficult to provide Marine species with natural foods

(i) We would need to see the list of which pigmenting compounds which are allowed under US Food & Drug Administration

(k) The producer of organic aquatic animals shall not:
(1) incorporate any type of antibiotic or hormone in feeds

JSF will have the requirement to treat fish stock with antibiotics during the cycle of growth. We do vaccinate but this does not solve every problem.
The OFF standard for Organic cod allows 3 treatments during the lifecycle for the benefit of fish welfare. This is by design so farmers do not postpone or write off treatments to the detriment of fish health & welfare.
Other badly drawn up standards do withdraw organic status if a farmer treats fish with any antibiotic, this only triggers bad decision making & push farmers into not treating fish.
This USDA standard should not create this problem by allowing treatment in cases where fish welfare will be impacted.

Fish meal & oil from Wild Fish
The two proposals for sourcing fish meal & oil are both flawed, at this current time.
Alternative A allows certification of wild fish although wild fish cannot be certified organic.
Even allowing fish from sustainable sources is a limited option with few fisheries available & problems with certifying the correct species.
This will only put further pressure on certifying more fisheries sustainable & cause further problems to this process.

Alternative B is not feasible at this point.
Further work with feed companies will be required to resolve these issues in an informed & sustainable manner

Note: JSF sources the correct species from offcuts of fish for human consumption, this also has only limited availability at this time.